

THE HONORABLE JAMES L. ROBART

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

HANY VELETANLIC,

Defendant.

No. CR18-162 JLR

MOTION TO MODIFY
CONDITIONS OF RELEASE

NOTE ON MOTION CALENDAR:
December 21, 2018

The Defendant, Hany Veletanlic, by and through his attorney, John Henry Browne, submits this Motion to Modify Conditions of Release. Mr. Veletanlic is requesting the removal of stand-alone location monitoring and drug and alcohol testing. Pretrial services indicates that it has no objection to the removal of the drug and alcohol testing condition and will defer to the court on removing the location monitoring requirement.

Mr. Velantanlic is charged by Indictment with various firearm related offenses. Dkt. #30. On May 8, 2018, a detention hearing was held, and Mr. Velantanlic was placed on bond with special conditions. Dkt. #12. For the last seven months Mr. Veletanlic has faithfully complied with his release conditions. He has submitted to drug testing both with pretrial services and with his treating psychiatrist. He has complied with location monitoring and computer monitoring.

1 The location monitoring ankle bracelet, however, is giving him problems
2 and is no longer necessary. Mr. Veletanlic has successfully demonstrated his
3 willingness to comply with travel restrictions and is not a flight risk. The drug and
4 alcohol testing requirement is duplicitous to the drug testing administered by his
5 psychiatrist.

6 For the reasons stated above, the defense respectfully requests that the court
7 remove the location monitoring and drug and alcohol testing conditions of Mr.
8 Veletanlic's pretrial release.
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10 DATED this 12th day of December 2018.

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12 Respectfully submitted,

13 s/ John Henry Browne

14 JOHN HENRY BROWNE, WSBA #4677

15 Attorney for Hany Veletanlic

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of December 2018, I electronically filed Defendant Hany Veletanlic's the pleading above with the clerk of the court using the CM/ECF system which will send notification of such filing to all the parties(s) of records. I hereby certify that I have served any other parties of record that are non-CM/ECF participants via Tele-fax/U.S. Postal mail.

s/ Lorie Hutt

Lorie Hutt, Paralegal

Law Offices of John Henry Browne, P.S.

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